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defendant were formally married and entered into matrimonial relations thinking that complainant's then husband was dead. Later, in order to place the legality of their relation beyond question, complainant procured a divorce from her lawful husband, who was in fact alive, but in parts unknown, after which defendant, in the presence of witnesses, assured complainant that she was his lawful wife, and that no other ceremony was necessary, and thereby induced complainant, by reliance on such representations, to remain with him as his wife for over twenty years. Under these circumstances it was held that defendant was estopped from denying the legality of the marriage with complainant.

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**BLOODHOUNDS.**—VA. CODE 1904, SEC. 4173C.—In *Denham v. Commonwealth*, 84 S. W. 538, the Kentucky Court of Appeals takes issue with the holding of the Nebraska Supreme Court that in a prosecution for crime evidence of the fact that bloodhounds went from the scene of the crime to defendant's home is not admissible in evidence. In the case mentioned it is held that, in a prosecution for assault with intent to kill, evidence of the trailing of defendant by bloodhounds, which were shown to have been of good breeding and to have been carefully trained in tracking men, and which had tracked and aided in the capture of many criminals, was admissible, although the pedigrees of the dogs were not asked about or stated with particularity.

Sec. 4173c of Va. Code 1904 provides especially for the raising and training of bloodhounds for "police purposes."

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**MARRIAGE BROKERAGE CONTRACT.**—The Supreme Court of Iowa holds a "marriage brokerage contract" to be invalid in the case of *In re Grobe's Estate*, 102 N. W. 804. The deceased agreed to pay complainant a certain amount if she would go to Chicago and see a woman whom deceased was desirous of marrying, and give her information concerning him. It did not appear whether deceased already had a contract of marriage with the woman or not, and in this respect the case differs somewhat from the ordinary marriage brokerage case. But the court holds that the rule that it is contrary to public policy to allow a recovery for services rendered in procuring a marriage is as applicable to advice or solicitation with reference to carrying out a marriage contract as it is with reference to the formation of such a contract.

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**TRADING STAMPS.**—VA. CODE 1904, SEC. 3827a.—In *People v. Zimmerman*, 92 N. Y. Sup. 497, the New York statute prohibiting dealing in trading stamps unless the stamp shall have legibly printed on the face thereof its redeemable value in money, and requiring it to be redeemed in goods or money at the option of the holder, as well as subjecting the person charged with its redemption to liability for its face value, but excepting from its provisions tickets or coupons issued by a merchant or manufacturer in his own name, and redeemable by him, is held to be unconstitutional, not only because it is unjustifiable as an exercise of the police power,